

**MARION & ALLEN, P.C.**

**488 Madison Avenue, Suite 1120, New York, New York 10022**

**BY: ROGER K. MARION, ESQ.**

[rmarion@rogermarion.com](mailto:rmarion@rogermarion.com)

**Telephone: (212) 658-0350**

**Mobile: (201) 264-6622**

May 31, 2022

VIA ECF

The Honorable Gabriel W. Gorenstein, J.D.C.  
United States District Court, S.D.N.Y.  
500 Pearl Street  
New York, New York 10007

**MEMORANDUM ENDORSED**

Re: Request For Discovery Conference  
*Adler v. Payward Inc.*, 1:18-cv-8100 (PAC)

Dear Judge Gorenstein:

This office represents Plaintiff Robert Adler in the above-referenced matter. I write pursuant to May 12, 2022 Order.

As you may be aware, this matter was referred to Your Honor because we have a discovery dispute where Plaintiff still does not feel that we have been given the core documents of the matter. The defense, of course will contest this. Further, Plaintiff has not been permitted, despite proper notice, to depose Defendant. We have met and conferred with regard to this issue and discussed the issue before Judge Crotty.

Therefore I respectfully request a discovery conference so that we can see if the Court can help resolve the discovery impasses without motion practice.

Thank you for your attention to this matter.

Respectfully submitted,



Roger K. Marion, Esq.

cc: Christopher R. Dyess (*via ECF*)

Application denied for failure to comply with paragraph 2.A of the Court's Individual Practices.

So Ordered.



GABRIEL W. CORENSTEIN  
United States Magistrate Judge

June 1, 2022